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6 **Attorneys for Plaintiffs**

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 (San Jose Division)

10 SACRAMENTO AREA ELECTRICAL
WORKERS HEALTH & WELFARE
11 TRUST; SACRAMENTO AREA
ELECTRICAL WORKERS PENSION
12 TRUST; SACRAMENTO AREA
ELECTRICAL WORKERS JOINT
13 APPRENTICESHIP & TRAINING TRUST;
SACRAMENTO AREA ELECTRICAL
14 WORKERS LABOR MANAGEMENT
COOPERATION COMMITTEE FUND;
15 SACRAMENTO AREA ELECTRICAL
WORKERS CONTRACT
16 ADMINISTRATION FUND; BOB WARD,
17 as trustee of the above trusts except for the
SACRAMENTO AREA ELECTRICAL
18 WORKERS PENSION TRUST; JEFF
19 STORY, as trustee of the SACRAMENTO
AREA ELECTRICAL WORKERS
20 PENSION TRUST; NATIONAL
ELECTRICAL BENEFIT FUND; and
21 INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL UNION
22 NO. 340

23 Plaintiffs,

24 v.

25
26 CROSS ELECTRIC and DENNIS DAMIEN
CROSS,

27 Defendants.
28

Case No. 17-CV-1074-EJD

**STIPULATION FOR CONTINGENT
DISMISSAL; ~~PROPOSED~~ ORDER**

NEYHART,
ANDERSON,
FLYNN &
GROSBOLL
ATTORNEYS AT LAW

Exhibit 1

1 Benjamin K. Lunch (SB #246015)
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23 Plaintiffs,

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25

26 CROSS ELECTRIC and DENNIS DAMIEN
CROSS,

27 Defendants.
28

Case No. 17-CV-1074-EJD

STIPULATED JUDGMENT

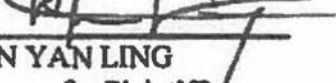
STIPULATED JUDGMENT; Case No. 17-CV-1074-EJD

NEYHART,
ANDERSON,
FLYNN &
GROSBOLL
ATTORNEYS AT LAW

1 The parties stipulate that judgment shall be entered in favor of Plaintiffs and against
2 Defendants, jointly and severally, in the amount of \$26,811.77, less all amounts received by
3 Plaintiffs on the Settlement Agreement dated June 12, 2017, and plus all amounts currently
4 owed by Defendants to Plaintiffs on said Settlement Agreement, Collective Bargaining
5 Agreement,¹ and applicable Trust Agreement(s), to wit: _____.

6
7
8 **IT IS SO STIPULATED AND AGREED.**

9
10 Dated: June 12, 2017

11 By: 
12 WAN YAN LING
13 Attorney for Plaintiffs
14 Neyhart, Anderson, Flynn & Grosboll

15 Dated: 6/14/2017

16 By: 
17 CROSS ELECTRIC

18
19 Dated: 6/14/2017

20 By: 
21 DENNIS DAMIEN CROSS

22 **IT IS SO ORDERED.**

23
24 Dated: _____

25 _____
26 U.S. District Court Judge

27 NEYHART,
28 ANDERSON,
FLYNN &
GROSBOLL
ATTORNEYS AT LAW

26 ¹ Labeled the "Inside Wireman's Agreement" which has been entered into by the Sacramento
27 Electrical Contractors Association and IBEW Local 340, and which Defendants are signatory to.

PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action. My business address is 369 Pine Street, Suite 800, San Francisco, California 94104. On July 26 2017, I served the within:

STIPULATION FOR CONTINGENT DISMISSAL; [PROPOSED] ORDER

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

Dennis Damien Cross
30 Main Street
Colusa, CA 95932

Cross Electric
30 Main Street
Colusa, CA 95932

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on July 26, 2017, at San Francisco, California.


Alison Strickland